JAN 2 0 2004
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FEDERAL ELECTION
COMMISSION
SECRETARIAT

l			BEFORE THE FEDE	RAL ELECTIC	ON COMMISSION	SECRETARIAT	
2	In the Matter of				ŀ	2004 JAN 20 1 A 9: 54	
4)			
5	Gene Stipe			.)	MURs 4818 and	4933	
6 7			tipe Law Firm)	•		
8	Walt Roberts Walt Roberts for Congress)	CE	NCITIVE	
9				j j	91	NSITIVE	
10				·			
11			GENERAL	COUNSEL'S I	REPORT #14		
12 13	I. ACTIONS RECOMMENDED						
14		1.	Accept three conciliation a	greements.	•		
15		2.	Close the file as to four res	pondents.			
16	II.	II. <u>BACKGROUND</u>					
17	MUR 4818 arose from a complaint alleging that Walt Roberts and Walt Roberts for						
18	Congress ("the Committee") knowingly and willfully violated 2 U.S.C. § 441a(f) by accepting						
19	prohibited contributions. Through the Commission's investigation, we discovered that Gene						
20 .	Stipe devised multiple schemes to contribute funds to the Committee, while hiding himself as the						
21	true source of the contributions.						
22		On May 31, 2002, the Commission found probable cause to believe that Stipe, The Stipe					
23	Law F	Law Firm ("the Firm"), and Roberts and the Committee, knowingly and willfully violated					
24	2 U.S.	2 U.S.C. § 441f and referred the violations to the United States Department of Justice ("DOJ").					
25	As a re	As a result of DOJ's action related to the Commission's referral, Roberts and Stipe both pleaded					
26	guilty to felonies. See GCR #10 (October 9, 2003) at 3 (discussing criminal pleas and						
27	senten	sentences).					

¹ Gene Stipe's sentencing, initially scheduled for October 8, 2003, is now scheduled for January 30, 2004 having been delayed six times. Stipe has made several statements to the media that indicate he will not seek a seventh delay.

On October 9, 2003, the Commission authorized this Office to enter probable cause conciliation with Stipe, the Firm, and Roberts and the Committee.² See GCR #10 (October 9, 2003). In this report, we recommend that the Commission accept the three conciliation agreements concerning these four respondents. Attachments 1-3. III. **DISCUSSION**

² The Commission also authorized this Office to enter probable cause conciliation with Charlene Spears, and enter pre-probable cause conciliation with James E. Lane, Francis Stipe, Michael Mass, Larry Morgan, Harold Massey, Sr., Paul Beavers and Edith "Susie" Beavers. To date, the Commission has accepted conciliation agreements with Michael Mass for \$30,000, Harold Massey, Sr., for \$36,000, and Larry Morgan for \$18,500. See GCR #11 (November 28, 2003), GCR #12 (December 9, 2003), and GCR #13 (December 31, 2003), respectively. We expect to make recommendations as to the remaining respondents in this Matter shortly.

CONCILIATION INFORMATION IS CONTAINED IN PAGES 3-7. THESE PAGES HAVE BEEN REMOVED FROM THE FILE.

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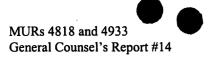
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IV. <u>RECOMMENDATIONS</u>

- 2 1. Accept the attached conciliation agreement with Gene Stipe.
 - 2. Accept the attached conciliation agreement with The Stipe Law Firm.
 - 3. Accept the attached conciliation agreement with Walt Roberts and Walt Roberts for Congress.
 - 4. Close the file as to Gene Stipe, The Stipe Law Firm, Walt Roberts, and Walt Roberts for Congress.
 - 5. Approve the appropriate letters.

Lawrence H. Norton General Counsel

1/16/04 Date

BY:

Rhonda J. Vosdingh

Associate General Counsel

for Enforcement

Jonathan A. Bernstein
Assistant General Counsel

Margaret J. Toalson

Attorney

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Attorney

Attachments:

- 1. Conciliation Agreement Gene Stipe
- 2. Conciliation Agreement The Stipe Law Firm
- 3. Conciliation Agreement Walt Roberts and Walt Roberts for Congress